

# EXHIBIT A



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

June 19, 2018

**VIA EMAIL AND U.S. MAIL**

David W. Hodges  
Kennedy Hodges, L.L.P.  
4409 Montrose Blvd, Ste 200  
Houston, TX, 77006  
[mtg.kennedyhodges.com](http://mtg.kennedyhodges.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Weaver, Donna v. 3M Company et al* Case No.: 0:17-cv-04754-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Plaintiffs' Last Name	Weaver
Plaintiffs' First Name	Donna
Case No.	17-cv-4754
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	02, 06, 09, 10, 11, 12, 13, 14, 15, 16
Section III (Surgery Information)	
Section III - Incomplete Questions	
Section IV - 1 (Vital Statistics)	Incomplete
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	Incomplete
Section V - 6 (Bankruptcy)	Incomplete
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	Incomplete
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	Incomplete
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	Incomplete
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Kennedy Hodges, L.L.P.
I.03.e - Plaintiffs' Counsel's Email	mtg@kennedyhodges.com



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May 7, 2018

**VIA EMAIL AND U.S. MAIL**

Daniel C. Burke  
Bernstein Liebhard LLP  
10 E. 40th Street  
New York, NY 10016  
[dburke@bernlieb.com](mailto:dburke@bernlieb.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Potter, Karen v. 3M Company et al* Case No.: 0:17-cv-04881-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure



Plaintiffs' Last Name	Potter
Plaintiffs' First Name	Karen
Case No.	17-cv-04881
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	2
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
Section V - 5 (Disability Claims)	
Section V - 6 (Lawsuits)	
Section V - 7 (Bankruptcy)	
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Bernstein Liebhard LLP
I.03.e - Plaintiffs' Counsel's Email	dburke@bernlieb.com dlee@bernlieb.com



Benjamin W. Hulse  
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April 17, 2018

**VIA EMAIL AND U.S. MAIL**

Daniel C. Burke  
Bernstein Liebhard LLP  
10 E. 40th Street  
New York, NY 10016  
[dburke@bernlieb.com](mailto:dburke@bernlieb.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Edwards, Renate v. 3M Company et al* Case No.: 0:17-cv-04891-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Edwards \_Renate \_17-CV-04891\_1\_Edwards \_Renate \_17-CV-04891\_1"

Edwards \_Renate \_17-  
CV-04891\_1\_Edwards  
\_Renate \_17-CV-  
04891\_1

PLAINTIFFS' LAST NAME - Edwards  
PLAINTIFFS' FIRST NAME - Renate  
CASE NO. - 17-CV-04891  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) -  
SECTION III (SURGERY INFORMATION) - Incomplete  
SECTION III - INCOMPLETE QUESTIONS - 03  
SECTION IV - 1 (VITAL STATISTICS) -  
SECTION IV - 10 (DRUG/ALCOHOL) -  
SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) -  
SECTION IV - 9 (TOBACCO) -  
SECTION IX - 1 (CONSORTIUM NAME ETC.) -  
SECTION IX - 3 (RESIDENCES) -  
SECTION IX - 4 (MARRIED) -  
SECTION V - 5 (DISABILITY CLAIMS) -  
SECTION V - 6 (LAWSUITS) -  
SECTION V - 7 (BANKRUPTCY) -  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) -  
SECTION VII - 2 (LOST FUTURE WAGES) -  
SECTION VIII - 2 (VERBAL/Written STATEMENT) -  
X.01 - SIGNED AUTHORIZATION -  
X.02.D - DOCUMENTS - SIGNED VERIFICATION -  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Bernstein Liebhard  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dburke@bernlieb.com, dlee@bernlieb.com



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Direct Dial: 612-343-3256  
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April 17, 2018

**VIA EMAIL AND U.S. MAIL**

Daniel C. Burke  
Bernstein Liebhard LLP  
10 E. 40th Street  
New York, NY 10016  
[dburke@bernlieb.com](mailto:dburke@bernlieb.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Johnston, Todd v. 3M Company et al* Case No.: 0:17-cv-05270-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Johnston\_Todd\_017-cv-05270\_1\_Johnston\_Todd\_017-cv-05270\_1"

Johnston\_Todd\_017-  
cv-  
05270\_1\_Johnston\_To  
dd\_017-cv-05270\_1

PLAINTIFFS' LAST NAME - Johnston  
PLAINTIFFS' FIRST NAME - Todd  
CASE NO. - 0:17-cv-05270  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS- 7  
SECTION III (SURGERY INFORMATION) - Incomplete  
SECTION III - INCOMPLETE QUESTIONS- 1  
SECTION IV - 1 (VITAL STATISTICS) -  
SECTION IV - 10 (DRUG/ALCOHOL) -  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) -  
SECTION IV - 8 (DENTAL PROCEDURES) -  
SECTION IV - 9 (TOBACCO) -  
SECTION IX - 1 (CONSORTIUM NAME ETC.) -  
SECTION IX - 3 (RESIDENCES) -  
SECTION IX - 4 (MARRIED) -  
SECTION V - 5 (DISABILITY CLAIMS) -  
SECTION V - 6 (LAWSUITS) -  
SECTION V - 7 (BANKRUPTCY) -  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) -  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) -  
SECTION VII - 2 (LOST FUTURE WAGES) -  
SECTION VIII - 2 (VERBAL/WITTEN STATEMENT) -  
X.01 - SIGNED AUTHORIZATION -  
X.02.D - DOCUMENTS - SIGNED VERIFICATION -  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Bernstein Liebhart  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dburke@bernlleb.com, dlee@bernlleb.com



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April 17, 2018

VIA EMAIL AND U.S. MAIL

Daniel C. Burke  
Bernstein Liebhard LLP  
10 E. 40th Street  
New York, NY 10016  
[dburke@bernlieb.com](mailto:dburke@bernlieb.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Billings, Willard v. 3M Company et al* Case No.: 0:17-cv-05277-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Billings\_Willard\_17-cv-05277\_1\_Billings\_Willard\_17-cv-05277\_1"

Billings\_Willard\_17-  
cv-  
05277\_1\_Billings\_Will  
ard\_17-cv-05277\_1

PLAINTIFFS' LAST NAME - Billings  
PLAINTIFFS' FIRST NAME - Willard  
CASE NO. - 17-cv-05277  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 02, 05, 07, 08, 09  
SECTION III (SURGERY INFORMATION) - Incomplete  
SECTION III - INCOMPLETE QUESTIONS - 03  
SECTION IV - 1 (VITAL STATISTICS) -  
SECTION IV - 10 (DRUG/ALCOHOL) -  
SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) -  
SECTION IV - 8 (DENTAL PROCEDURES) -  
SECTION IV - 9 (TOBACCO) -  
SECTION IX - 1 (CONSORTIUM NAME ETC.) -  
SECTION IX - 3 (RESIDENCES) -  
SECTION IX - 4 (MARRIED) -  
SECTION V - 5 (DISABILITY CLAIMS) -  
SECTION V - 6 (LAWSUITS) -  
SECTION V - 7 (BANKRUPTCY) -  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) -  
SECTION VII - 2 (LOST FUTURE WAGES) -  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -  
X.01 - SIGNED AUTHORIZATION -  
X.02.D - DOCUMENTS - SIGNED VERIFICATION -  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Bernstein Liebhard  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dburke@bernlleb.com, dlee@bernlleb.com





Benjamin W. Hulse  
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May 7, 2018

**VIA EMAIL AND U.S. MAIL**

Daniel C. Burke  
Bernstein Liebhard LLP  
10 E. 40th Street  
New York, NY 10016  
[dburke@bernlieb.com](mailto:dburke@bernlieb.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Bresnock, Anne v. 3M Company et al* Case No.: 0:17-cv-05371-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Plaintiffs' Last Name	Bresnock
Plaintiffs' First Name	Anne
Case No.	0:17-cv-05371
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	02, 06 10
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
Section V - 5 (Disability Claims)	
Section V - 6 (Lawsuits)	
Section V - 7 (Bankruptcy)	
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Bernstein Liebhard LLP
I.03.e - Plaintiffs' Counsel's Email	dlee@bernlieb.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

May 7, 2018

**VIA EMAIL AND U.S. MAIL**

Daniel C. Burke  
Bernstein Liebhard LLP  
10 E. 40th Street  
New York, NY 10016  
[dburke@bernlieb.com](mailto:dburke@bernlieb.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Swales, Bertha v. 3M Company et al* Case No.: 0:18-cv-00045-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Plaintiffs' Last Name	Swales
Plaintiffs' First Name	Bertha
Case No.	18-cv-0045
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01, 03
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
Section V - 5 (Disability Claims)	Incomplete
Section V - 6 (Lawsuits)	
Section V - 7 (Bankruptcy)	
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Bernstein Liebhard LLP
I.03.e - Plaintiffs' Counsel's Email	dburke@bernlieb.com dlee@bernlieb.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

June 4, 2018

VIA EMAIL AND U.S. MAIL

Tayjes Matthew Shah  
The Miller Firm, LLC  
108 Railroad Avenue  
Orange, VA 22960  
[jtravers@millermfirmllc.com](mailto:jtravers@millermfirmllc.com);  
[TShah@MillerFirmLLC.com](mailto:TShah@MillerFirmLLC.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Shoaf et al v. 3M Company et al* Case No.: 0:18-cv-00167-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse



Plaintiffs' Last Name	Shoaf
Plaintiffs' First Name	Phillip
Case No.	18-cv-00167-JNE-FLN
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	10
Section III (Surgery Information)	
Section III - Incomplete Questions	
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Miller Firm
I.03.e - Plaintiffs' Counsel's Email	tshah@millerfirmllc.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

June 27, 2018

**VIA EMAIL AND U.S. MAIL**

Amanda M. Williams  
Gustafson Gluek PLLC  
120 South Sixth Street, Suite 2600  
Minneapolis, MN 55402  
[awilliams@gustafsongluek.com](mailto:awilliams@gustafsongluek.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Ballasso, Marilyn v. 3M Company et al* Case No.: 0:18-cv-00575-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure



Plaintiffs' Last Name	Ballasso
Plaintiffs' First Name	Marilyn
Case No.	18-cv-00575
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01, 02, 03, 05, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16
Section III (Surgery Information)	
Section III - Incomplete Questions	01 03 04 05
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	Incomplete
Section IV - 10 (Drug/Alcohol)	Incomplete
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	Incomplete
Section V - 6 (Bankruptcy)	Incomplete
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	Incomplete
Section VI - 7 (3M/Arizant Communications)	Incomplete
Section VI - 8 (3M/Arizant Warranty)	Incomplete
Section VI - 9 (Augustine)	Incomplete
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	Incomplete
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Gustafson Gluek PLLC
I.03.e - Plaintiffs' Counsel's Email	awilliams@gustafsongluek.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

July 11, 2018

**VIA EMAIL AND U.S. MAIL**

David W. Hodges  
Kennedy Hodges, L.L.P.  
4409 Montrose Blvd, Ste 200  
Houston, TX, 77006  
[mtg@kennedyhodges.com](mailto:mtg@kennedyhodges.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Doyle, Linda v. 3M Company et al* Case No.: 0:18-cv-00660-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Plaintiffs' Last Name	Doyle
Plaintiffs' First Name	Linda
Case No.	18-cv-660
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01, 02, 03, 05, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16
Section III (Surgery Information)	
Section III - Incomplete Questions	
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	Incomplete
Section IV - 10 (Drug/Alcohol)	Incomplete
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	Incomplete
Section V - 6 (Bankruptcy)	Incomplete
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	Incomplete
Section VI - 7 (3M/Arizant Communications)	Incomplete
Section VI - 8 (3M/Arizant Warranty)	Incomplete
Section VI - 9 (Augustine)	Incomplete
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	Incomplete
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	Incomplete
Section IX - 4 (Married)	Incomplete
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Kennedy Hodges, L.L.P.
I.03.e - Plaintiffs' Counsel's Email	mtg@kennedyhodges.com

# EXHIBIT B

**From:** [Ted Hartman](#)  
**To:** [Dae Yeol Lee](#); [Ben Hulse](#)  
**Cc:** [bgordon@levinlaw.com](#); [David J. Szerlag \(david@pritzkerlaw.com\)](#); [Daniel C. Burke](#)  
**Subject:** RE: MTD (PTO 14)  
**Date:** Thursday, August 09, 2018 10:07:00 AM  
**Attachments:** [image002.png](#)

---

Confirmed.

Ted

**Ted D. Hartman**

**Blackwell Burke P.A.**

431 South Seventh Street, Suite 2500

Minneapolis, MN 55415

Direct (612) 343-3234

Fax (612) 343-3205

*Licensed to practice in Minnesota, Illinois, and Nebraska.*

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---

**From:** Dae Yeol Lee <dlee@bernlieb.com>  
**Sent:** Thursday, August 09, 2018 10:04 AM  
**To:** Ted Hartman <thartman@blackwellburke.com>; Ben Hulse <bhulse@blackwellburke.com>  
**Cc:** bgordon@levinlaw.com; David J. Szerlag (david@pritzkerlaw.com) <david@pritzkerlaw.com>; Daniel C. Burke <dburke@bernlieb.com>  
**Subject:** RE: MTD (PTO 14)

Ted:

We will agree to submit an amended PFSs with updated verifications for the following:

1. Billings
2. Edwards
3. Johnston
4. Parker
5. Henderson

Please confirm that you will withdraw the Motion on these.

Thanks,

Dae

---

**From:** Ted Hartman [<mailto:thartman@blackwellburke.com>]



**Sent:** Thursday, August 9, 2018 10:35 AM

**To:** Dae Yeol Lee; Ben Hulse

**Cc:** [bgordon@levinlaw.com](mailto:bgordon@levinlaw.com); David J. Szerlag ([david@pritzkerlaw.com](mailto:david@pritzkerlaw.com)); Daniel C. Burke

**Subject:** RE: MTD (PTO 14)

Dae:

In my initial response I indicated the section number and question number next to each of the Plaintiffs. You can refer to the corresponding addenda in our Motion if you need further clarification on why these responses are deficient. My reference to "proper supporting verifications" was just to clarify that the amended answers (that you would be agreeing to provide) will need to be accompanied by newly executed verifications.

Thank you,  
Ted

**Ted D. Hartman**

**Blackwell Burke P.A.**

431 South Seventh Street, Suite 2500

Minneapolis, MN 55415

Direct (612) 343-3234

Fax (612) 343-3205

*Licensed to practice in Minnesota, Illinois, and Nebraska.*

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---

**From:** Dae Yeol Lee <[dlee@bernlieb.com](mailto:dlee@bernlieb.com)>

**Sent:** Thursday, August 09, 2018 9:26 AM

**To:** Ted Hartman <[thartman@blackwellburke.com](mailto:thartman@blackwellburke.com)>; Ben Hulse <[bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)>

**Cc:** [bgordon@levinlaw.com](mailto:bgordon@levinlaw.com); David J. Szerlag ([david@pritzkerlaw.com](mailto:david@pritzkerlaw.com)) <[david@pritzkerlaw.com](mailto:david@pritzkerlaw.com)>; Daniel C. Burke <[dburke@bernlieb.com](mailto:dburke@bernlieb.com)>

**Subject:** RE: MTD (PTO 14)

Hi Ted –

I would appreciate if you could please specify what's deficient in the following amended PFSs:

1. Billings
2. Edwards
3. Johnston
4. Parker
5. Henderson

Also, please clarify what you mean by "with proper supporting verifications" for the above-mentioned Plaintiffs? Along with their amended PFSs in response to your deficiency notices, they

have provided their signed verification forms.

As for the Plaintiffs that you are not agreeing to drop the Motion, please specify if you are disputing certain portion of their amended PFSs or all answers responsive to your most recent deficiency notice.

Thank you,

Dae

---

**From:** Ted Hartman [<mailto:thartman@blackwellburke.com>]  
**Sent:** Wednesday, August 8, 2018 5:43 PM  
**To:** Dae Yeol Lee; Ben Hulse  
**Cc:** [bgordon@levinlaw.com](mailto:bgordon@levinlaw.com); David J. Szerlag ([david@pritzkerlaw.com](mailto:david@pritzkerlaw.com)); Daniel C. Burke  
**Subject:** RE: MTD (PTO 14)

Good afternoon, Dae.

We have reviewed your PFSs in each of the cases identified. Below is Defendants' position on each:

1. Defendants will withdraw the Motion as to cases where the deficiencies are cured:

*Ingram* (17-4470)

2. Defendants will withdraw the Motion as to the following cases, but will be sending amended deficiency notices:

*Gorbett* (17-3252)

*Thornton* (17-4889)

3. If you confirm in writing that the remaining deficiencies identified in these cases will be cured (with proper supporting verifications), Defendants will withdraw the Motion as to the following cases\*:

*Billings* (17-5277) [Sections III.1, and VI.3]

*Edwards* (17-4891) [Sections III.3, IV.7, and VI.3]

*Johnston* (17-52701) [Section III.1]

*Parker* (17-3573) [Sections II.15, and VI.1]

*Henderson* (17-4517) [Sections II.10, VI.3, and VII.1]

4. Defendants will not agree to drop the Motion as to the following cases:

*Rude* (17-4009)

*Pine* (17-4777)

*Brown* (17-4778)

*Potter* (17-4881)



McEvoy (17-4885)  
Hardy (17-5261)  
Taplin (17-5370)  
Bresnock (17-5371)  
Swales (18-45)

\*Please notify me as to all cases in Group 3 that you will agree to cure. These cases will remain on Defendants' Deficiency Lists and Defendants will move to dismiss those cases that have not been cured prior to the filing of the next Motion to Dismiss for Failure to Comply with PTO 14.

We will notify the Court.

Thank you,  
Ted

**Ted D. Hartman**

**Blackwell Burke P.A.**

431 South Seventh Street, Suite 2500

Minneapolis, MN 55415

Direct (612) 343-3234

Fax (612) 343-3205

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---

**From:** Dae Yeol Lee <[dlee@bernlieb.com](mailto:dlee@bernlieb.com)>  
**Sent:** Tuesday, August 07, 2018 4:28 PM  
**To:** Ted Hartman <[thartman@blackwellburke.com](mailto:thartman@blackwellburke.com)>; Ben Hulse <[bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)>  
**Cc:** [bgordon@levinlaw.com](mailto:bgordon@levinlaw.com); David J. Szerlag ([david@pritzkerlaw.com](mailto:david@pritzkerlaw.com)) <[david@pritzkerlaw.com](mailto:david@pritzkerlaw.com)>; Daniel C. Burke <[dburke@bernlieb.com](mailto:dburke@bernlieb.com)>  
**Subject:** Re: MTD (PTO 14)

Hi Ted/Ben –

We served PFS deficiency responses for all cases listed in your MTD, which was filed on 8/2. These include the following:

1. Gorbett (17-cv-03252)
2. Parker (17-cv-03573)
3. Rude (17-cv-04009)
4. Ingram (17-cv-04470)
5. Henderson (17-cv-04517)
6. Pine (17-cv-04777)
7. Brown (17-cv-04778)

8. Potter (17-cv-04881)
9. McEvoy (17-cv-04885)
10. Thornton (17-cv-04889)
11. Edwards (17-cv-04891)
12. Hardy (17-cv-05261)
13. Johnston (17-cv-05270)
14. Billings (17-cv-05277)
15. Taplin (17-cv-05370)
16. Bresnock (17-cv-05371)
17. Swales (18-cv-00045)

Given our response deadline is fast approaching, I would appreciate it if you could review our responses and withdraw your motion on these.

Thank you,

Dae



Dae Yeol Lee  
**Bernstein Liebhard LLP**  
10 East 40th Street  
New York, NY 10016  
Direct: 212-951-2070  
Main: (212) 779-1414  
Fax: (212) 779-3218  
[dlee@bernlieb.com](mailto:dlee@bernlieb.com)  
[www.bernlieb.com](http://www.bernlieb.com)

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# EXHIBIT C



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

June 22, 2018

**VIA EMAIL AND U.S. MAIL**

Daniel A. Nigh  
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.  
316 South Baylen St. Suite 400  
Pensacola, Florida 32502  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Wright v. 3M Company* Case No.: 0:17-cv-01701-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Plaintiffs' Last Name	Wright
Plaintiffs' First Name	Michael
Case No.	0:17-cv-01701
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01, 02, 03, 05, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01, 02, 03, 04, 05
Section IV - 1 (Vital Statistics)	Incomplete
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	Incomplete
Section IV - 10 (Drug/Alcohol)	Incomplete
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	Incomplete
Section V - 6 (Bankruptcy)	Incomplete
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	Incomplete
Section VI - 7 (3M/Arizant Communications)	Incomplete
Section VI - 8 (3M/Arizant Warranty)	Incomplete
Section VI - 9 (Augustine)	Incomplete
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	Incomplete
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	Incomplete
Section IX - 4 (Married)	Incomplete
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

June 22, 2018

**VIA EMAIL AND U.S. MAIL**

Daniel A. Nigh  
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.  
316 South Baylen St. Suite 400  
Pensacola, Florida 32502  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Johnson v. 3M Company et al* Case No.: 0:17-cv-02426-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure



Plaintiffs' Last Name	Johnson
Plaintiffs' First Name	J. Edwards
Case No.	0:17-cv-02426
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01, 06, 07, 09
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	03
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com





Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

February 14, 2018

**VIA EMAIL AND U.S. MAIL**

David W. Hodges  
Kennedy Hodges, L.L.P.  
4409 Montrose Blvd, Ste 200  
Houston, TX, 77006  
[mtg@kennedyhodges.com](mailto:mtg@kennedyhodges.com)

*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Moore v. 3M Company et al Case No.:0:17-cv-02901-JNE-FLN*

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Moore\_Mike\_17-cv-2901\_1\_Moore\_Mike\_17-cv-2901\_1"

Moore\_Mike\_17-cv-  
2901\_1\_Moore\_Mike\_1  
7-cv-2901\_1

PLAINTIFFS' LAST NAME - Moore  
PLAINTIFFS' FIRST NAME - Mike  
CASE NO. - 17-cv-2901  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 05, 06  
SECTION III (SURGERY INFORMATION) -  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) -  
SECTION IV - 8 (DENTAL PROCEDURES) -  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete  
SECTION IX - 3 (RESIDENCES) - Incomplete  
SECTION IX - 4 (MARRIED) - Incomplete  
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete  
SECTION V - 6 (LAWSUITS) - Incomplete  
SECTION V - 7 (BANKRUPTCY) - Incomplete  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) - Incomplete  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WITTEN STATEMENT) - Incomplete  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges, L.L.P.  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodges.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

June 22, 2018

**VIA EMAIL AND U.S. MAIL**

Daniel A. Nigh  
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.  
316 South Baylen St. Suite 400  
Pensacola, Florida 32502  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Ewing v. 3M Company et al* Case No.: 0:17-cv-04967-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Plaintiffs' Last Name	Ewing
Plaintiffs' First Name	Kelly
Case No.	0:17-cv-04967
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	10
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01, 02
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse  
Direct Dial: 612-343-3266  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

June 6, 2018

**VIA EMAIL AND U.S. MAIL**

Seth Webb  
Brown and Crouppen, P.C.  
211 N. Broadway, Suite 1600  
St. Louis, MO 63102  
[sethw@getbc.com](mailto:sethw@getbc.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Hanks, Julie v. 3M Company et al* Case No.: 0:17-cv-05052-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure



Plaintiffs' Last Name	Hanks
Plaintiffs' First Name	Julie
Case No.	0:17-cv-5052
Section I (Case Information)	Incomplete
Section I - Incomplete Questions	4
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01, 02, 03, 05, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01 02 03 04 05
Section IV - 1 (Vital Statistics)	Incomplete
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	Incomplete
Section IV - 10 (Drug/Alcohol)	Incomplete
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	Incomplete
Section V - 6 (Bankruptcy)	Incomplete
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	Incomplete
Section VI - 7 (3M/Arizant Communications)	Incomplete
Section VI - 8 (3M/Arizant Warranty)	Incomplete
Section VI - 9 (Augustine)	Incomplete
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	Incomplete
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	Incomplete
Section IX - 4 (Married)	Incomplete
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Brown & Crouppen
I.03.e - Plaintiffs' Counsel's Email	sethw@getbc.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

June 18, 2018

**VIA EMAIL AND U.S. MAIL**

Daniel A. Nigh  
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.  
316 South Baylen St. Suite 400  
Pensacola, Florida 32502  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Lykes-Tarver, Tracy v. 3M Company* Case No.: 0:17-cv-05327-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Plaintiffs' Last Name	Lykes-Tarver
Plaintiffs' First Name	Willie
Case No.	0:17-cv-05327
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	07 09 10
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

July 10, 2018

**VIA EMAIL AND U.S. MAIL**

Daniel A. Nigh  
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA  
316 S Baylen St - Ste 600  
Pensacola, FL 32502  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Meyers, Leslie v. 3M Company* Case No.: 0:17-cv-05426-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Plaintiffs' Last Name	Meyers, Jr
Plaintiffs' First Name	Leslie
Case No.	0:17-cv-05426
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com





Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

July 5, 2018

**VIA EMAIL AND U.S. MAIL**

Noah C. Lauricella  
GoldenbergLaw, PLLC  
800 LaSalle Avenue, Suite 2150  
Minneapolis, MN 55402  
[nlauricella@goldenberglaw.com](mailto:nlauricella@goldenberglaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Goodrum, Vernon v. 3M Company et al* Case No.: 0:18-cv-00146-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Plaintiffs' Last Name	Goodrum
Plaintiffs' First Name	Vernon
Case No.	18-cv-00146 (JNE/FLN)
Section I (Case Information)	Incomplete
Section I - Incomplete Questions	1, 4
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01, 02, 05, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01 02 03 04 05
Section IV - 1 (Vital Statistics)	Incomplete
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	Incomplete
Section IV - 10 (Drug/Alcohol)	Incomplete
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	Incomplete
Section V - 6 (Bankruptcy)	Incomplete
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	Incomplete
Section VI - 7 (3M/Arizant Communications)	Incomplete
Section VI - 8 (3M/Arizant Warranty)	Incomplete
Section VI - 9 (Augustine)	Incomplete
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	Incomplete
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	GoldenbergLaw, PLLC
I.03.e - Plaintiffs' Counsel's Email	nlauricella@goldenberglaw.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

June 18, 2018

**VIA EMAIL AND U.S. MAIL**

Travis R. Walker  
The Law offices of Travis R. Walker, P.A.  
1235 SE Indian Street, Suite 101  
Stuart, Florida 34997  
[traviswalker@traviswalkerlaw.com](mailto:traviswalker@traviswalkerlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Brabham, Earnest v. 3M Company et al* Case No.: 0:18-cv-00262-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Plaintiffs' Last Name	Brabham
Plaintiffs' First Name	Ernest
Case No.	0:18-cv-00262
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	2
Section III (Surgery Information)	
Section III - Incomplete Questions	
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	Incomplete
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	The Law Offices of Travis R Walker
I.03.e - Plaintiffs' Counsel's Email	TravisWalker@traviswalkerlaw.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

July 2, 2018

**VIA EMAIL AND U.S. MAIL**

Brett Emison  
Langdon and Emison  
911 Main Street, PO Box 220  
Lexington, MO 64067  
[rachel@lelaw.com](mailto:rachel@lelaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Boyle, Maureen v. 3M Company et al* Case No.: 0:18-cv-00628-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure



Plaintiffs' Last Name	Boyle
Plaintiffs' First Name	Maureen
Case No.	18-cv-00628
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	
Section III - Incomplete Questions	
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	Incomplete
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Langdon and Emison LLC
I.03.e - Plaintiffs' Counsel's Email	brett@lelaw.com rachel@lelaw.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

July 5, 2018

**VIA EMAIL AND U.S. MAIL**

John Christopher Elliot  
Bachus & Schanker, LLC  
1899 Wynkoop Street, Suite 700  
Denver, CO 80202  
[celliott@coloradolaw.net](mailto:celliott@coloradolaw.net)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Hughes, Wilbert v. 3M Company et al* Case No.: 0:18-cv-00665-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Plaintiffs' Last Name	HUGHES
Plaintiffs' First Name	WILBERT
Case No.	18-CV-00665-JNE-FLN
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	07 08 10
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Bachus & Schanker, LLC
I.03.e - Plaintiffs' Counsel's Email	celliott@coloradolaw.net



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

July 5, 2018

**VIA EMAIL AND U.S. MAIL**

Daniel A. Nigh  
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.  
316 South Baylen St. Suite 400  
Pensacola, Florida 32502  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Bunk, Susan v. 3M Company* Case No.: 0:18-cv-00676-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

<b>Plaintiffs' Last Name</b>	Bunk
<b>Plaintiffs' First Name</b>	Susan
<b>Case No.</b>	0:18-cv-00676
<b>Section I (Case Information)</b>	Incomplete
<b>Section I - Incomplete Questions</b>	4
<b>Section II (Personal Information)</b>	Incomplete
<b>Section II - Incomplete Questions</b>	01, 02, 03, 05, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16
<b>Section III (Surgery Information)</b>	Incomplete
<b>Section III - Incomplete Questions</b>	01 04 05
<b>Section IV - 1 (Vital Statistics)</b>	Incomplete
<b>Section IV - 3 (Healthcare Providers)</b>	Incomplete
<b>Section IV - 7 (Pharmacies/Drugstores)</b>	Incomplete
<b>Section IV - 8 (Dental Procedures)</b>	Incomplete
<b>Section IV - 9 (Tobacco)</b>	Incomplete
<b>Section IV - 10 (Drug/Alcohol)</b>	Incomplete
<b>Section V - 4 (Disability Claims)</b>	Incomplete
<b>Section V - 5 (Lawsuits)</b>	Incomplete
<b>Section V - 6 (Bankruptcy)</b>	Incomplete
<b>Section VI - 1 (Physical Injury)</b>	Incomplete
<b>Section VI - 3 (Emotional Distress)</b>	Incomplete
<b>Section VI - 6 (Warnings)</b>	Incomplete
<b>Section VI - 7 (3M/Arizant Communications)</b>	Incomplete
<b>Section VI - 8 (3M/Arizant Warranty)</b>	Incomplete
<b>Section VI - 9 (Augustine)</b>	Incomplete
<b>Section VII - 1 (Lost Past Wages)</b>	Incomplete
<b>Section VII - 2 (Lost Future Wages)</b>	Incomplete
<b>Section VIII - 2 (Verbal/Written Statement)</b>	Incomplete
<b>Section IX - 1 (Consortium Name etc.)</b>	Incomplete
<b>Section IX - 3 (Residences)</b>	Incomplete
<b>Section IX - 4 (Married)</b>	Incomplete
<b>X.01 - Signed Authorization</b>	Incomplete
<b>X.02.d - Documents - Signed Verification</b>	Incomplete
<b>I.03.b - Plaintiffs' Counsel's Firm</b>	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
<b>I.03.e - Plaintiffs' Counsel's Email</b>	dnigh@levinlaw.com





Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

July 5, 2018

**VIA EMAIL AND U.S. MAIL**

Daniel A. Nigh  
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.  
316 South Baylen St. Suite 400  
Pensacola, Florida 32502  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Dupont, Roy v. 3M Company* Case No.: 0:18-cv-00690-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Plaintiffs' Last Name	Dupont
Plaintiffs' First Name	Roy
Case No.	0:18-cv-00690
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	05 10
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	Incomplete
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

July 24, 2018

**VIA EMAIL AND U.S. MAIL**

Christopher Coffin  
Pendley, Baudin & Coffin L.L.P.  
24110 Eden St.P.O. Drawer 71  
Plaquemine, LA 70765  
[ccoffin@pbclawfirm.com](mailto:ccoffin@pbclawfirm.com), [nrockforte@pbclawfirm.com](mailto:nrockforte@pbclawfirm.com)  
[jperez@pbclawfirm.com](mailto:jperez@pbclawfirm.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Willimon, Brenda v. 3M Company et al* Case No.: 0:18-cv-00881-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel

Plaintiffs' Last Name	Willimon
Plaintiffs' First Name	Brenda D.
Case No.	MDL No. 15-2666 (JNE/FLN)
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	02 10
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Pendley, Baudin & Coffin LLP
I.03.e - Plaintiffs' Counsel's Email	sshirey@pbclawfirm.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

June 11, 2018

**VIA EMAIL AND U.S. MAIL**

Daniel A. Nigh  
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA  
316 S Baylen St, Ste 600  
Pensacola, FL 32502  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Chapman, Joann v. 3M Company* Case No.: 0:18-cv-01137-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure



Plaintiffs' Last Name	Chapman
Plaintiffs' First Name	Joann
Case No.	0:18-cv-01137
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	2
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

July 3, 2018

**VIA EMAIL AND U.S. MAIL**

Daniel A. Nigh  
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA  
316 S Baylen St, Ste 600  
Pensacola, FL 32502  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Lombardo, James v. 3M Company* Case No.: 0:18-cv-01154-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Plaintiffs' Last Name	Lombardo
Plaintiffs' First Name	James
Case No.	0:18-cv-01154
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	7
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01 03
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

July 23, 2018

**VIA EMAIL AND U.S. MAIL**

Genevieve M. Zimmerman  
Meshbeshier & Spence  
1616 Park Avenue  
Minneapolis, MN 55404  
[gzimmerman@meshbeshier.com](mailto:gzimmerman@meshbeshier.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Lane, Tonya v. 3M Company et al* Case No.: 0:18-cv-01345-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Plaintiffs' Last Name	Lane
Plaintiffs' First Name	Tonya
Case No.	18-cv-01345
Section I (Case Information)	Incomplete
Section I - Incomplete Questions	4
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	10
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	03
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	Incomplete
Section IX - 4 (Married)	Incomplete
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Meshbesher & Spence, Ltd.
I.03.e - Plaintiffs' Counsel's Email	araso@meshbesher.com



# EXHIBIT D

**From:** Mary Young

**Sent:** Friday, August 10, 2018 4:48 PM

**To:** [JoanEricksen\\_Chambers@mnd.uscourts.gov](mailto:JoanEricksen_Chambers@mnd.uscourts.gov); [schultz\\_chambers@mnd.uscourts.gov](mailto:schultz_chambers@mnd.uscourts.gov)

**Cc:** Genevieve Zimmerman - Meshbesh & Spence ([gzimmerman@meshbesh.com](mailto:gzimmerman@meshbesh.com))

[<gzimmerman@meshbesh.com>](mailto:gzimmerman@meshbesh.com); Gabriel Assaad ([gassaad@kennedyhodes.com](mailto:gassaad@kennedyhodes.com))

[<gassaad@kennedyhodes.com>](mailto:gassaad@kennedyhodes.com); Jan Conlin ([JMC@ciresiconlin.com](mailto:JMC@ciresiconlin.com)) [<JMC@ciresiconlin.com>](mailto:JMC@ciresiconlin.com); Ben

Gordon ([bgordon@levinlaw.com](mailto:bgordon@levinlaw.com)) [<bgordon@levinlaw.com>](mailto:bgordon@levinlaw.com); Jerry Blackwell

[<blackwell@blackwellburke.com>](mailto:blackwell@blackwellburke.com); Lyn Pruitt [<LPruitt@mwlaw.com>](mailto:LPruitt@mwlaw.com); Ben Hulse

[<bhulse@blackwellburke.com>](mailto:bhulse@blackwellburke.com); David Szerlag [<david@pritzkerlaw.com>](mailto:david@pritzkerlaw.com); Bridget Ahmann

[<Bridget.Ahmann@FaegreBD.com>](mailto:Bridget.Ahmann@FaegreBD.com)

**Subject:** MDL 2666 - Joint Agenda and Report for Aug. 16 Status Conference

Dear Judge Ericksen and Judge Schultz,

In accordance with Pretrial Order No. 3, attached is the parties' Joint Agenda and Report for the status conference scheduled for Thursday, August 16. Defendants' three lists related to the Plaintiff Fact Sheets, as discussed in Section 2 of the Joint Agenda, are also attached to this email.

Sincerely,

Mary Young

**Mary S. Young**

**Blackwell Burke P.A.**

431 South Seventh Street, Suite 2500

Minneapolis, MN 55415

Direct (612) 343-3214

Fax (612) 343-3205

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**Defendants' PFS List 1: Overdue Plaintiff Fact Sheets**  
(Updated August 10, 2018)

Case Number	Title	Date Filed	Due Date	Prior Listing	Firm Name
0:18-cv-00641-JNE-DTS	Rhew, Barbara v. 3M Company, et al.	3/7/2018	6/5/2018	6/15/2018 7/13/2018	Morris Law Firm
0:18-cv-00572-JNE-DTS	Gauthier, Kim v. 3M Company, et al.	3/1/2018	5/31/2018	7/13/2018	Schlichter, Bogard & Denton, LLP
0:18-cv-00708-JNE-DTS	Fairfax, Betty v. 3M Company, et al.	3/14/2018	6/12/2018	7/13/2018	DeGaris & Rogers, LLC
0:18-cv-00757-JNE-DTS	Homsheer, Larry v. 3M Company, et al.	3/20/2018	6/18/2018	7/13/2018	Bernstein Liebhard LLP
0:18-cv-00758-JNE-DTS	Butler, Frances Eloise v. 3M Company, et al.	3/20/2018	6/18/2018	7/13/2018	Fears Nachawati, PLLC
0:18-cv-00802-JNE-DTS	Brown, Charles v. 3M Company, et al.	3/23/2018	6/21/2018	7/13/2018	The Olinde Firm, LLC
0:18-cv-00805-JNE-DTS	Archie, Yvonne et al v. 3M Company, et al.	3/23/2018	6/21/2018	7/13/2018	The Webster Law Firm
0:18-cv-00839-JNE-DTS	Pavia, Johnny et al v. 3M Company, et al.	3/26/2018	6/24/2018	7/13/2018	Fears Nachawati, PLLC
0:18-cv-00840-JNE-DTS	Stidham, Robert et al v. 3M Company, et al.	3/26/2018	6/24/2018	7/13/2018	Fears Nachawati, PLLC
0:18-cv-00842-JNE-DTS	Wiggins, Francis v. 3M Company, et al.	3/26/2018	6/24/2018	7/13/2018	Fears Nachawati, PLLC
0:18-cv-00855-JNE-DTS	Short, Vincent v. 3M Company, et al.	3/27/2018	6/25/2018	7/13/2018	The Law offices of Travis R. Walker, P.A.
0:18-cv-00856-JNE-DTS	Negron, Angel v. 3M Company, et al.	3/27/2018	6/25/2018	7/13/2018	The Law offices of Travis R. Walker, P.A.
0:18-cv-00883-JNE-DTS	McAlister, Mary v. 3M Company, et al.	3/29/2018	6/27/2018	7/13/2018	Schlichter Bogard & Denton, LLP
0:18-cv-00929-JNE-DTS	Tillia, Jeffrey v. 3M Company, et al.	4/3/2018	7/2/2018	7/13/2018	DeGaris & Rogers, LLC
0:18-cv-00955-JNE-DTS	Gordon, James v. 3M Company, et al.	4/6/2018	7/5/2018	7/13/2018	Davis & Crump, P.C.
0:16-cv-03859-JNE-DTS	Mahfouz Jr., Joseph v. 3M Company, et al.	11/8/2016	7/2/2018		Davis & Crump, P.C.
0:17-cv-00088-JNE-DTS	Malinski v. 3M Company, et al.	1/9/2017	12/1/2017		Gustafson Gluek PLLC
0:17-cv-00688-JNE-DTS	Moore, Eric (Matthews, Linda) v. 3M Company, et al.	3/6/2017	7/2/2018		Davis & Crump, P.C.
0:18-cv-01002-JNE-DTS	Phillips, Virgil v. 3M Company, et al.	4/13/2018	7/12/2018		Davis & Crump, P.C.
0:18-cv-01009-JNE-DTS	Woelfel, Rosemarie et al v. 3M Company, et al.	4/25/2018	7/24/2018		Brown Chiari, LLP
0:18-cv-01107-JNE-DTS	Churchill, Sandra et al v. 3M Company, et al.	4/25/2018	7/24/2018		Meshbeshier & Spence
0:18-cv-01150-JNE-DTS	Stapleton, Bebe v. 3M Company, et al.	4/27/2018	7/26/2018		Davis & Crump, P.C.
0:18-cv-01161-JNE-DTS	LeBeau, Kimberly v. 3M Company, et al.	4/27/2018	7/26/2018		Davis & Crump, P.C.
0:18-cv-01175-JNE-DTS	Collins, Jean v. 3M Company, et al.	4/30/2018	7/29/2018		Bernstein Liebhard LLP
0:18-cv-01190-JNE-DTS	Mitchell, Randall v. 3M Company, et al.	5/1/2018	7/30/2018		Farr, Farr, Emerich, Hackett, Carr & Holmes, P.A.

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

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**Defendants' PFS List 1: Overdue Plaintiff Fact Sheets**  
(Updated August 10, 2018)

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**Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices**  
(Updated August 10, 2018)

Case Number	Title	1st Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:17-cv-04778-JNE-DTS	Brown, Ina v. 3M Company, et al.	4/17/2018	5/8/2018	6/15/2018 7/13/2018	Bernstein Liebhard LLP
0:17-cv-04881-JNE-DTS	Potter, Karen v. 3M Company, et al.	7/10/2018	7/31/2018	6/15/2018 7/13/2018	Bernstein Liebhard LLP
0:17-cv-04885-JNE-DTS	McEvoy, Mark v. 3M Company, et al.	5/7/2018	5/28/2018	6/15/2018 7/13/2018	Bernstein Liebhard LLP
0:17-cv-05123-JNE-DTS	Robinson-Bessicks, Alberta v. 3M Company, et al.	5/10/2018	5/31/2018	6/15/2018 7/13/2018	Kirtland and Packard LLP
0:17-cv-05261-JNE-DTS	Hardy, Alan v. 3M Company, et al.	4/17/2018	5/8/2018	6/15/2018 7/13/2018	Bernstein Liebhard LLP
0:17-cv-05370-JNE-DTS	Taplin, Janice v. 3M Company, et al.	5/7/2018	5/28/2018	6/15/2018 7/13/2018	Bernstein Liebhard LLP
0:17-cv-05371-JNE-DTS	Bresnock, Anne v. 3M Company, et al.	5/7/2018	5/28/2018	6/15/2018 7/13/2018	Bernstein Liebhard LLP
0:18-cv-00045-JNE-DTS	Swales, Bertha v. 3M Company, et al.	5/7/2018	5/28/2018	6/15/2018 7/13/2018	Bernstein Liebhard LLP
0:17-cv-04891-JNE-DTS	Edwards, Renate v. 3M Company, et al.	4/17/2018	5/8/2018	6/15/2018 7/13/2018	Bernstein Liebhard LLP
0:17-cv-05270-JNE-DTS	Johnston, Todd v. 3M Company, et al.	4/17/2018	5/8/2018	6/15/2018 7/13/2018	Bernstein Liebhard LLP
0:17-cv-05277-JNE-DTS	Billings, Willard v. 3M Company, et al.	4/17/2018	5/8/2018	6/15/2018 7/13/2018	Bernstein Liebhard LLP
0:17-cv-05477-JNE-DTS	Shepard, Andrew v. 3M Company, et al.	5/24/2018	6/14/2018	7/13/2018	Johnson Becker, PLLC
0:17-cv-05550-JNE-DTS	Bishop, Alma v. 3M Company, et al.	6/8/2018	6/29/2018	7/13/2018	Davis & Crump, P.C.
0:18-cv-00063-JNE-DTS	Morgan, Zachary v. 3M Company, et al.	5/29/2018	6/19/2018	7/13/2018	Johnson Becker, PLLC
0:18-cv-00067-JNE-DTS	Carlson, Glenn v. 3M Company, et al.	5/24/2018	6/14/2018	7/13/2018	Johnson Becker, PLLC
0:18-cv-00139-JNE-DTS	Stedman, Robert v. 3M Company, et al.	5/24/2018	6/14/2018	7/13/2018	Johnson Becker, PLLC
0:18-cv-00166-JNE-DTS	Davis, Thomas v. 3M Company, et al.	5/29/2018	6/19/2018	7/13/2018	Johnson Becker, PLLC
0:18-cv-00249-JNE-DTS	Glasscock, Elizabeth v. 3M Company, et al.	6/11/2018	7/2/2018	7/13/2018	DeGaris & Rogers, LLC
0:18-cv-00451-JNE-DTS	Gregg, Cynthia v. 3M Company, et al.	6/14/2018	7/5/2018	7/13/2018	Gustafson Gluek PLLC
0:18-cv-00460-JNE-DTS	Kilmer, David v. 3M Company, et al.	6/11/2018	7/2/2018	7/13/2018	Kennedy Hodges, L.L.P.
0:17-cv-05584-JNE-DTS	Tribble, Mayetta v. 3M Company, et al.	6/11/2018	7/2/2018		Lockridge Grindal Nauen PLLP
0:18-cv-00076-JNE-DTS	Kurbis, Melanie v. 3M Company, et al.	7/10/2018	7/31/2018		Davis & Crump, P.C.
0:18-cv-00093-JNE-DTS	Ashley, Ruth v. 3M Company, et al.	7/16/2018	8/6/2018		Bernstein Liebhard LLP

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**Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices**  
(Updated August 10, 2018)

0:18-cv-00151-JNE-DTS	Russell, Janice v. 3M Company, et al.	7/16/2018	8/6/2018		Bernstein Liebhard LLP
0:18-cv-00178-JNE-DTS	Paul, Rodney v. 3M Company, et al.	7/10/2018	7/31/2018		Davis & Crump, P.C.
0:18-cv-00205-JNE-DTS	Shulz, Shelley v. 3M Company, et al.	7/16/2018	8/6/2018		Bernstein Liebhard LLP
0:18-cv-00220-JNE-DTS	Brasher, Michael v. 3M Company, et al.	7/16/2018	8/6/2018		Bernstein Liebhard LLP
0:18-cv-00274-JNE-DTS	Malone, Brenda v. 3M Company, et al.	7/16/2018	8/6/2018		Bernstein Liebhard LLP
0:18-cv-00445-JNE-DTS	Haskell, Sandra v. 3M Company, et al.	7/10/2018	7/31/2018		Davis & Crump, P.C.
0:18-cv-00575-JNE-DTS	Ballasso, Marilyn v. 3M Company, et al.	6/27/2018	7/18/2018		Gustafson Gluek PLLC
0:18-cv-00660-JNE-DTS	Doyle, Linda v. 3M Company, et al.	7/11/2018	8/1/2018		Kennedy Hodges, L.L.P.
0:18-cv-00803-JNE-DTS	Farrell, Thomas v. 3M Company, et al.	7/10/2018	7/31/2018		The Olinde Firm, LLC
0:18-cv-00804-JNE-DTS	Maehle, Mark v. 3M Company, et al.	7/10/2018	7/31/2018		The Olinde Firm, LLC
0:18-cv-00814-JNE-FLN	Baldwin, Rose v. 3M Company et al	7/16/2018	8/6/2018		The Miller Firm, LLC
0:18-cv-00815-JNE-DTS	Moody, Kenneth v. 3M Company, et al.	7/10/2018	7/31/2018		Davis & Crump, P.C.
0:18-cv-00991-JNE-DTS	Hawkins, Loretta v. 3M Company, et al.	7/17/2018	8/6/2018		DeGaris & Rogers, LLC
Case Number	Title	2nd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:17-cv-04779-JNE-DTS	Key, Nancy v. 3M Company, et al.	4/27/2018	5/18/2018	6/15/2018 7/13/2018	Kennedy Hodges, L.L.P.
0:17-cv-04777-JNE-DTS	Pine, Randy v. 3M Company, et al..	5/7/2018	5/28/2018	6/15/2018 7/13/2018	Bernstein Liebhard LLP
0:17-cv-04302-JNE-DTS	Tilley, William v. 3M Company, et al.	6/6/2018	6/27/2018	7/13/2018	The Olinde Firm, LLC
0:17-cv-04375-JNE-DTS	Baker, David v. 3M Company, et al.	5/29/2018	6/19/2018	7/13/2018	Bernstein Liebhard LLP
0:17-cv-04512-JNE-DTS	Cunningham, Mary v. 3M Company, et al.	5/29/2018	6/19/2018	7/13/2018	Bernstein Liebhard LLP
0:17-cv-04517-JNE-DTS	Henderson, Stephanie v. 3M Company, et al.	5/7/2018	5/28/2018	6/15/2018 7/13/2018	Bernstein Liebhard LLP
0:17-cv-04752-JNE-DTS	Hyer, David v. 3M Company, et al.	5/4/2018	5/25/2018	6/15/2018 7/13/2018	Gustafson Gluek PLLC
0:17-cv-04877-JNE-DTS	McDonald, Ethel v 3M et al	5/29/2018	6/19/2018	7/13/2018	Bernstein Liebhard LLP
0:17-cv-04857-JNE-DTS	Murphy, Bennie v 3M et al	5/29/2018	6/19/2018	7/13/2018	Bernstein Liebhard LLP
0:18-cv-00167-JNE-DTS	Shoaf et al v. 3M Company, et al.	6/4/2018	6/25/2018	7/13/2018	The Miller Firm, LLC

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**Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices**  
(Updated August 10, 2018)

0:17-cv-05199-JNE-DTS	Spry, John et al v. 3M Company, et al.	7/5/2018	7/26/2018		Pendley, Baudin & Coffin L.L.P.
0:17-cv-05202-JNE-DTS	Reed, Tommy et al v. 3M Company, et al.	7/5/2018	7/26/2018		Pendley, Baudin & Coffin L.L.P.
0:17-cv-05383-JNE-DTS	Long, Ross v. 3M Company, et al.	7/10/2018	7/31/2018		Davis & Crump, P.C.
0:17-cv-05435-JNE-DTS	Echols, Kevin v. 3M Company, et al.	7/5/2018	7/26/2018		DeGaris & Rogers, LLC
0:17-cv-05546-JNE-DTS	Richardson, Timothy v. 3M Company, et al.	7/10/2018	7/31/2018		Davis & Crump, P.C.
<b>Case Number</b>	<b>Title</b>	<b>3rd Deficiency Notice Sent</b>	<b>Response Due Date</b>	<b>Prior Listing</b>	<b>Firm Name</b>
0:17-cv-03696-JNE-DTS	Hickman, Alan v. 3M Company, et al.	4/27/2018	5/18/2018	6/15/2018 7/13/2018	Kennedy Hodges, L.L.P.
0:17-cv-04754-JNE-DTS	Weaver, Donna v. 3M Company, et al.	6/19/2018	7/10/2018		Kennedy Hodges, L.L.P.
0:17-cv-05271-JNE-DTS	Gilmore, Kenneth et al v. 3M Company, et al.	6/18/2018	7/9/2018		The Webster Law Firm



**Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response**  
(Updated August 10, 2018)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:17-cv-03563-JNE-DTS	Opperman, Charlene v. 3M Company, et al.	5/2/2018	6/15/2018 7/13/2018	Kennedy Hodges, L.L.P.
0:17-cv-03718-JNE-DTS	Seymore, Mary v. 3M Company, et al.	4/27/2018	6/15/2018 7/13/2018	Kennedy Hodges, L.L.P.
0:17-cv-03952-JNE-DTS	Pratt, Debra et al v. 3M Company, et al.	4/25/2018	6/15/2018 7/13/2018	Brent Coon & Associates
0:17-cv-04009-JNE-DTS	Rude, Lynas v. 3M Company, et al.	5/28/2018	6/15/2018 7/13/2018	Bernstein Liebhard LLP
0:17-cv-04385-JNE-DTS	Erdman, Elmer v. 3M Company, et al.	4/18/2018	6/15/2018 7/13/2018	Brown & Crouppen, PC
0:17-cv-04433-JNE-DTS	Greene, James v. 3M Company	4/25/2018	6/15/2018 7/13/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:17-cv-04654-JNE-DTS	Keith, Kody v. 3M Company, et al.	5/9/2018	6/15/2018 7/13/2018	Brown and Crouppen, P.C.
0:17-cv-04677-JNE-DTS	Resendez, Esperanza v. 3M Company, et al.	5/9/2018	6/15/2018 7/13/2018	Brown and Crouppen, P.C.
0:17-cv-04845-JNE-DTS	Murray, Dan v. 3M Company, et al.	5/17/2018	6/15/2018 7/13/2018	Kirtland and Packard LLP
0:16-cv-00787-JNE-DTS	Abrams v. 3M Company, et al.	4/19/2017	7/13/2018	Thering & Associates, PLLC
0:16-cv-02298-JNE-DTS	D'andrea, Mario et al v. 3M Company, et al.	4/19/2017	7/13/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-03573-JNE-DTS	Parker, Lloyd v. 3M Company, et al.	5/7/2018	6/15/2018 7/13/2018	Bernstein Liebhard LLP
0:17-cv-03824-JNE-DTS	Henry, Lawrence v. 3M Company, et al.	5/30/2018	7/13/2018	Kennedy Hodges, L.L.P.
0:17-cv-04333-JNE-DTS	Carney, Robert et al v. 3M Company, et al.	5/29/2018	7/13/2018	Gustafson Gluek PLLC
0:17-cv-04800-JNE-DTS	Waters, Christopher v. 3M Company, et al.	5/29/2018	7/13/2018	Peterson & Associates, P.C.
0:17-cv-04859-JNE-DTS	Bradford, Darryl v. 3M Company, et al.	4/25/2018	7/13/2018	The Miller Firm, LLC
0:17-cv-05052-JNE-DTS	Hanks, Julie v. 3M Company, et al.	6/6/2018	7/13/2018	Brown and Crouppen, P.C.
0:17-cv-05087-JNE-DTS	Morgan, Travis v. 3M Company, et al.	6/11/2018	7/13/2018	GoldenbergLaw, PLLC
0:18-cv-00022-JNE-DTS	Klante, Randall v. 3M Company, et al.	6/8/2018	7/13/2018	Kirtland & Packard LLP
0:18-cv-00032-JNE-DTS	DeArman, Lori v. 3M Company, et al.	6/6/2018	7/13/2018	Kirtland & Packard LLP
0:18-cv-00240-JNE-DTS	Dixon, Michael v. 3M Company	6/4/2018	7/13/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A

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**Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response**  
(Updated August 10, 2018)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-00424-JNE-DTS	Harris, Lola v. 3M Company, et al.	6/13/2018	7/13/2018	Kirtland & Packard LLP
0:18-cv-00678-JNE-DTS	Tawes, George v. 3M Company	6/6/2018	7/13/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:15-cv-03736-JNE-DTS	Printup ( Charlene Smiley) v. 3M Company, et al.	6/28/2017		Gustafson Gluek PLLC
0:17-cv-01701-JNE-DTS	Wright, Michael v. 3M Company	6/22/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:17-cv-01703-JNE-DTS	Ussery, Bruce v. 3M Company	6/22/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-02426-JNE-DTS	Johnson, Edwards et al v. 3M Company	6/22/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-02901-JNE-DTS	Moore, Michael v. 3M Company, et al.	2/14/2018		Kennedy Hodges, L.L.P.
0:17-cv-03941-JNE-DTS	Martinez, Rodney v. 3M Company, et al.	7/5/2018		DeGaris & Rogers, LLC
0:17-cv-04169-JNE-DTS	Hurley, Jonathan v. 3M Company, et al.	4/2/2018		The Olinde Firm, LLC
0:17-cv-04967-JNE-DTS	Ewing, Kelly v. 3M Company	6/22/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:17-cv-05135-JNE-DTS	Carrell, Silas v. 3M Company, et al.	7/2/2018		Kirtland and Packard LLP
0:17-cv-05242-JNE-DTS	Farrenkopf, Barbara v. 3M Company, et al.	6/28/2018		GoldenbergLaw, PLLC
0:17-cv-05327-JNE-DTS	Lykes-Tarver, Tracy v. 3M Company	6/18/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:17-cv-05348-JNE-DTS	Wilmer, Roxanne v. 3M Company, et al.	7/2/2018		Schlichter Bogard & Denton, LLP
0:17-cv-05424-JNE-DTS	Kent, Maude v. 3M Company	7/10/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-05426-JNE-DTS	Meyers, Leslie v. 3M Company	7/10/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-05541-JNE-DTS	Alessi, Ann Marie v. 3M Company, et al.	6/6/2018		GoldenbergLaw, PLLC
0:17-cv-05593-JNE-DTS	Blaszczak, Mary v. 3M Company, et al.	6/13/2018		GoldenbergLaw, PLLC

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**Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response**  
(Updated August 10, 2018)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:17-cv-05594-JNE-DTS	Booras, Richard v. 3M Company, et al.	6/11/2018		GoldenbergLaw, PLLC
0:18-cv-00088-JNE-DTS	Christ, Ralph et al v. 3M Company, et al.	6/25/2018		Murray Law Firm
0:18-cv-00146-JNE-DTS	Goodrum, Vernon v. 3M Company, et al.	7/5/2018		GoldenbergLaw, PLLC
0:18-cv-00231-JNE-DTS	Lambert, Vincent v. 3M Company, et al.	7/10/2018		Swartz & Swartz, P.C.
0:18-cv-00255-JNE-DTS	Zieschang, Roxanne et al v. 3M Company, et al.	6/29/2018		The Webster Law Firm
0:18-cv-00262-JNE-DTS	Brabham, Earnest v. 3M Company, et al.	6/18/2018		The Law offices of Travis R. Walker, P.A.
0:18-cv-00292-JNE-DTS	Matson, Charles v. 3M Company, et al.	6/29/2018		Meshbeshier & Spence
0:18-cv-00397-JNE-DTS	Knight, Cecil v. 3M Company, et al.	6/4/2018		GoldenbergLaw, PLLC
0:18-cv-00432-JNE-DTS	Falcetta, Edward v. 3M Company	6/8/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00453-JNE-DTS	Johnson-Ryan, Mary v. 3M Company, et al.	6/13/2018		GoldenbergLaw, PLLC
0:18-cv-00512-JNE-DTS	Flynn, Michael v. 3M Company, et al.	6/19/2018		GoldenbergLaw, PLLC
0:18-cv-00562-JNE-DTS	Guzman, Rosemary v. 3M Company, et al.	6/18/2018		Brown & Crouppen, PC
0:18-cv-00593-JNE-DTS	Franklin, Kenneth v. 3M Company	6/19/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00594-JNE-DTS	Roberts, Greta v. 3M Company	7/2/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00595-JNE-DTS	Smith, Daun v. 3M Company	7/5/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00599-JNE-DTS	White, Cynthia v. 3M Company	7/10/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00600-JNE-DTS	Trude, Barbara v. 3M Company	7/3/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00602-JNE-DTS	Lambright, Ottis et al v. 3M Company, et al.	6/27/2018		Murray Law Firm
0:18-cv-00615-JNE-DTS	Warnberg, Ray v. 3M Company, et al.	6/28/2018		Murray Law Firm

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.



**Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response**  
(Updated August 10, 2018)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-00628-JNE-DTS	Boyle, Maureen v. 3M Company, et al.	7/2/2018		Langdon and Emison
0:18-cv-00655-JNE-DTS	Marlow, Homer et al v. 3M Company, et al.	6/4/2018		Raizner Slania LLP
0:18-cv-00665-JNE-DTS	Hughes, Wilbert v. 3M Company, et al.	7/5/2018		Bachus & Schanker, LLC
0:18-cv-00667-JNE-DTS	Boucher, Donald and Carol et al v. 3M Company, et al.	7/5/2018		Bachus & Schanker, LLC
0:18-cv-00668-JNE-DTS	Hartfield, Charles and Julie et al v. 3M Company, et al.	7/5/2018		Bachus & Schanker, LLC
0:18-cv-00669-JNE-DTS	Counard-Stowell, Sandra v. 3M Company	7/3/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00670-JNE-DTS	Darwick, Robert v. 3M Company	7/18/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00671-JNE-DTS	McAvoy, Karen v. 3M Company	7/9/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00672-JNE-DTS	Prudhomme, Laura v. 3M Company	7/2/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00673-JNE-DTS	Rudolph, Sheila v. 3M Company	7/10/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00674-JNE-DTS	Welch, Leon v. 3M Company	7/10/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00675-JNE-DTS	Wolf, Joyce v. 3M Company	6/29/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00676-JNE-DTS	Bunk, Susan v. 3M Company	7/5/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00688-JNE-DTS	Conrad, John v. 3M Company	7/11/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00689-JNE-DTS	Alexander, Todd v. 3M Company	7/16/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00690-JNE-DTS	Dupont, Roy v. 3M Company	7/5/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A

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Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.

**Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response**  
(Updated August 10, 2018)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-00691-JNE-DTS	Hauser, Michael v. 3M Company	6/29/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00881-JNE-DTS	Willimon, Brenda v. 3M Company, et al.	7/24/2018		Pendley, Baudin & Coffin L.L.P.
0:18-cv-00884-JNE-DTS	Bosarge, Judy v. 3M Company	7/10/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-00962-JNE-DTS	Snow, Lorraine v. 3M Company	7/19/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00963-JNE-DTS	Wolfe, Stanley v. 3M Company	7/5/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00965-JNE-DTS	Branch, Charles v. 3M Company	7/10/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-01096-JNE-DTS	Phillips, Virginia v. 3M Company	7/16/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01097-JNE-DTS	Ramondo, Joseph v. 3M Company	7/18/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01099-JNE-DTS	Reid, Patricia v. 3M Company	7/18/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01100-JNE-DTS	Richards, Linda v. 3M Company	6/19/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01101-JNE-DTS	Roshell, Doreen v. 3M Company	6/19/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01111-JNE-DTS	Turner, Carrie v. 3M Company	6/19/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01119-JNE-DTS	Scott, Margaret v. 3M Company	7/18/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01120-JNE-DTS	Sherman, Mary v. 3M Company	6/19/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01123-JNE-DTS	Twichell, Ben v. 3M Company	6/19/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA

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**Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response**  
(Updated August 10, 2018)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-01125-JNE-DTS	Dixon, Harold et al v. 3M Company	6/19/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01126-JNE-DTS	Watkins, Franscine v. 3M Company	6/19/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01136-JNE-DTS	Boylan, Gerald Jr.v. 3M Company	6/19/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01137-JNE-DTS	Chapman, Joann v. 3M Company	6/11/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01139-JNE-DTS	Clark, Lasonia v. 3M Company	6/8/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01140-JNE-DTS	Berk, Judith v. 3M Company	6/19/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01148-JNE-DTS	Libbey, Letha v. 3M Company	7/2/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01154-JNE-DTS	Lombardo, James v. 3M Company	7/3/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01157-JNE-DTS	Mason, Walter Jr. v. 3M Company	7/3/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01158-JNE-DTS	Owens, Sandra v. 3M Company	7/5/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01170-JNE-DTS	Jasmund, Allen v. 3M Company	6/19/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01345-JNE-DTS	Lane, Tonya v. 3M Company, et al.	7/23/2018		Meshbesher & Spence

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# **EXHIBIT E**

**From:** Ben Hulse

**Sent:** Monday, September 17, 2018 5:21 PM

**To:** [JoanEricksen Chambers@mnd.uscourts.gov](mailto:JoanEricksen_Chambers@mnd.uscourts.gov); [schultz\\_chambers@mnd.uscourts.gov](mailto:schultz_chambers@mnd.uscourts.gov)

**Cc:** Genevieve Zimmerman - Meshbesh & Spence ([gzimmerman@meshbesh.com](mailto:gzimmerman@meshbesh.com))

[<gzimmerman@meshbesh.com>](mailto:gzimmerman@meshbesh.com); Gabriel Assaad ([gassaad@kennedyhodes.com](mailto:gassaad@kennedyhodes.com))

[<gassaad@kennedyhodes.com>](mailto:gassaad@kennedyhodes.com); Jan Conlin ([JMC@ciresiconlin.com](mailto:JMC@ciresiconlin.com)) [<JMC@ciresiconlin.com>](mailto:JMC@ciresiconlin.com); Ben

Gordon ([bgordon@levinlaw.com](mailto:bgordon@levinlaw.com)) [<bgordon@levinlaw.com>](mailto:bgordon@levinlaw.com); Jerry Blackwell

[<blackwell@blackwellburke.com>](mailto:blackwell@blackwellburke.com); Lyn Pruitt [LPruitt@mwlaw.com](mailto:LPruitt@mwlaw.com); David Szerlag

[<david@pritzkerlaw.com>](mailto:david@pritzkerlaw.com); Bridget Ahmann [Bridget.Ahmann@FaegreBD.com](mailto:Bridget.Ahmann@FaegreBD.com); Mary Young

[<myoung@blackwellburke.com>](mailto:myoung@blackwellburke.com); Ben Gordon [<bengordonlaw@aol.com>](mailto:bengordonlaw@aol.com)

**Subject:** RE: MDL 2666 - Joint Agenda and Report for Aug. 16 Status Conference

Dear Judge Ericksen and Judge Schultz,

In accordance with Pretrial Order No. 3, attached is the parties' Joint Agenda and Report for the status conference scheduled for Thursday, September 20. Defendants' three lists related to the Plaintiff Fact Sheets, as discussed in Section 2 of the Joint Agenda, are also attached to this email.

Best regards,

Ben Hulse

Benjamin W. Hulse

Blackwell Burke P.A.

431 South Seventh Street, Suite 2500

Minneapolis, MN 55415

Direct (612) 343-3256

Fax (612) 343-3205

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**Defendants' PFS List 1: Overdue Plaintiff Fact Sheets**  
(Updated September 17, 2018)

Case Number	Title	Date Filed	Due Date	Prior Listing	Firm Name
0:18-cv-00572-JNE-DTS	Gauthier, Kim v. 3M Company, et al.	3/1/2018	5/31/2018	7/13/2018	Schlichter, Bogard & Denton, LLP
0:18-cv-00757-JNE-DTS	Homsher, Larry v. 3M Company, et al.	3/20/2018	6/18/2018	7/13/2018 8/10/2018	Bernstein Liebhard LLP
0:18-cv-00758-JNE-DTS	Butler, Frances Eloise v. 3M Company, et al.	3/20/2018	6/18/2018	7/13/2018 8/10/2018	Fears Nachawati, PLLC
0:18-cv-00802-JNE-DTS	Brown, Charles v. 3M Company, et al.	3/23/2018	6/21/2018	7/13/2018 8/10/2018	The Olinde Firm, LLC
0:18-cv-00839-JNE-DTS	Pavia, Johnny et al v. 3M Company, et al.	3/26/2018	6/24/2018	7/13/2018 8/10/2018	Fears Nachawati, PLLC
0:18-cv-00840-JNE-DTS	Stidham, Robert et al v. 3M Company, et al.	3/26/2018	6/24/2018	7/13/2018 8/10/2018	Fears Nachawati, PLLC
0:18-cv-00842-JNE-DTS	Wiggins, Francis v. 3M Company, et al.	3/26/2018	6/24/2018	7/13/2018 8/10/2018	Fears Nachawati, PLLC
0:18-cv-00855-JNE-DTS	Short, Vincent v. 3M Company, et al.	3/27/2018	6/25/2018	7/13/2018 8/10/2018	The Law offices of Travis R. Walker, P.A.
0:18-cv-00856-JNE-DTS	Negron, Angel v. 3M Company, et al.	3/27/2018	6/25/2018	7/13/2018 8/10/2018	The Law offices of Travis R. Walker, P.A.
0:18-cv-01009-JNE-DTS	Woelfel, Rosemarie et al v. 3M Company, et al.	4/25/2018	7/24/2018	8/10/2018	Brown Chiari, LLP
0:18-cv-01175-JNE-DTS	Collins, Jean v. 3M Company, et al.	4/30/2018	7/29/2018	8/10/2018	Bernstein Liebhard LLP
0:18-cv-01263-JNE-DTS	Anctil, Fernand v. 3M Company, et al.	5/7/2018	8/5/2018	8/10/2018	Davis & Crump, P.C.
0:18-cv-01283-JNE-DTS	Winegar, Connie v. 3M Company, et al.	5/8/2018	8/6/2018	8/10/2018	Bernstein Liebhard LLP
0:18-cv-00080-JNE-DTS	Harris, Jimmie Don v. 3M Company et al	1/11/2018	4/11/2018		Davis & Crump, P.C.
0:18-cv-00264-JNE-DTS	Wega, Salvatore v. 3M Company et al	1/29/2018	4/29/2018		The Law offices of Travis R. Walker, P.A.
0:18-cv-00529-JNE-DTS	Logsdon, Wanda v. 3M Company et al	2/23/2018	5/24/2018		Davis & Crump, P.C.
0:18-cv-01308-JNE-DTS	Hasan, Hope v. 3M Company et al	5/11/2018	8/9/2018		Davis & Crump, P.C.
0:18-cv-01346-JNE-DTS	Blair, Catherine v. 3M Company et al	5/16/2018	8/14/2018		Davis & Crump, P.C.
0:18-cv-01353-JNE-DTS	Van Nieuwenhuiz, Richard v. 3M Company et al	5/16/2018	8/14/2018		Davis & Crump, P.C.
0:18-cv-01362-JNE-DTS	DeSimone, Sandra v. 3M Company et al	5/17/2018	8/15/2018		Kennedy Hodges, LLP
0:18-cv-01381-JNE-DTS	White, Edward v. 3M Company et al	5/18/2018	8/16/2018		Davis & Crump, P.C.
0:18-cv-01421-JNE-DTS	Ross, Marie v. 3M Company et al	5/24/2018	8/22/2018		Farr, Farr, Emerich, Hackett, Carr & Holmes, P.A.
0:18-cv-01435-JNE-DTS	Swatchick, Lou Todd et al v. 3M Company et al	5/25/2018	8/23/2018		Meshbesher & Spence
0:18-cv-01455-JNE-DTS	Matteo, Barbara v. 3M Company et al	5/25/2018	8/23/2018		Morris Law Firm
0:18-cv-01456-JNE-DTS	Manheim, Kathleen v. 3M Company et al	5/25/2018	8/23/2018		Morris Law Firm
0:18-cv-01497-JNE-DTS	Wallace, Jerry v. 3M Company et al	5/30/2018	8/28/2018		McSweeney / Langevin LLC

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**Defendants' PFS List 1: Overdue Plaintiff Fact Sheets**  
(Updated September 17, 2018)

Case Number	Title	Date Filed	Due Date	Prior Listing	Firm Name
0:18-cv-01513-JNE-DTS	Thomas, Milton et al v. 3M Company et al	5/31/2018	8/29/2018		The Webster Law Firm
0:18-cv-01523-JNE-DTS	Butters, Kenneth v. 3M Company et al	5/31/2018	8/29/2018		Kirtland & Packard LLP
0:18-cv-01536-JNE-DTS	Myers, Lois v. 3M Company et al	6/1/2018	8/30/2018		Davis & Crump, P.C.
0:18-cv-01537-JNE-DTS	Cochran, Loretta v. 3M Company et al	6/4/2018	9/2/2018		Meshbesher & Spence
0:18-cv-01542-JNE-DTS	Davis, Harry v. 3M Company et al	6/4/2018	9/2/2018		Schlichter Bogard & Denton, LLP
0:18-cv-01545-JNE-DTS	Friesen, Janice v. 3M Company et al	6/4/2018	9/2/2018		Davis & Crump, P.C.
0:18-cv-01575-JNE-DTS	Connors, Patricia v. 3M Company et al	6/6/2018	9/4/2018		Meshbesher & Spence
0:18-cv-01613-JNE-DTS	Dobeck, Donna v. 3M Company et al	6/8/2018	9/6/2018		Kennedy Hodges, LLP



**Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices**  
(Updated September 17, 2018)

Case Number	Title	1st Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:17-cv-04881-JNE-DTS	Potter, Karen v. 3M Company et al	5/7/2018	5/28/2018	6/15/2018 7/13/2018 8/10/2018	Bernstein Liebhard LLP
0:17-cv-04891-JNE-DTS	Edwards, Renate v. 3M Company et al	4/17/2018	5/8/2018	6/15/2018 7/13/2018 8/10/2018	Bernstein Liebhard LLP
0:17-cv-05270-JNE-DTS	Johnston, Todd v. 3M Company et al	4/17/2018	5/8/2018	6/15/2018 7/13/2018 8/10/2018	Bernstein Liebhard LLP
0:17-cv-05277-JNE-DTS	Billings, Willard v. 3M Company et al	4/17/2018	5/8/2018	6/15/2018 7/13/2018 8/10/2018	Bernstein Liebhard LLP
0:17-cv-05323-JNE-DTS	Richey, Priscilla v. 3M Company, et al.	4/16/2018	5/7/2018	6/15/2018 7/13/2018 8/10/2018	Kennedy Hodges, L.L.P.
0:17-cv-05370-JNE-DTS	Taplin, Janice v. 3M Company et al	5/7/2018	5/28/2018	6/15/2018 7/13/2018 8/10/2018	Bernstein Liebhard LLP
0:17-cv-05371-JNE-DTS	Bresnock, Anne v. 3M Company et al	5/7/2018	5/28/2018	6/15/2018 7/13/2018 8/10/2018	Bernstein Liebhard LLP
0:18-cv-00045-JNE-DTS	Swales, Bertha v. 3M Company et al	5/7/2018	5/28/2018	6/15/2018 7/13/2018 8/10/2018	Bernstein Liebhard LLP
0:17-cv-05477-JNE-DTS	Shepard, Andrew v. 3M Company, et al.	5/24/2018	6/14/2018	7/13/2018 8/10/2018	Johnson Becker, PLLC
0:18-cv-00093-JNE-DTS	Ashley, Ruth v. 3M Company, et al.	7/16/2018	8/6/2018	8/10/2018	Bernstein Liebhard LLP
0:18-cv-00151-JNE-DTS	Russell, Janice v. 3M Company, et al.	7/16/2018	8/6/2018	8/10/2018	Bernstein Liebhard LLP
0:18-cv-00205-JNE-DTS	Shulz, Shelley v. 3M Company, et al.	7/16/2018	8/6/2018	8/10/2018	Bernstein Liebhard LLP
0:18-cv-00220-JNE-DTS	Brasher, Michael v. 3M Company, et al.	7/16/2018	8/6/2018	8/10/2018	Bernstein Liebhard LLP
0:18-cv-00274-JNE-DTS	Malone, Brenda v. 3M Company, et al.	7/16/2018	8/6/2018	8/10/2018	Bernstein Liebhard LLP
0:18-cv-00575-JNE-DTS	Ballasso, Marilyn v. 3M Company, et al.	6/27/2018	7/18/2018	8/10/2018	Gustafson Gluek PLLC
0:18-cv-00660-JNE-DTS	Doyle, Linda v. 3M Company, et al.	7/11/2018	8/1/2018	8/10/2018	Kennedy Hodges, L.L.P.
0:18-cv-00991-JNE-DTS	Hawkins, Loretta v. 3M Company, et al.	7/17/2018	8/6/2018	8/10/2018	DeGaris & Rogers, LLC
0:17-cv-00712-JNE-DTS	Haladay, Jeffrey (OBO Harold Owens) v. 3M Company	8/3/2018	8/24/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-02147-JNE-DTS	(Foote, Diane ) Sims v. 3M Company et al	8/3/2018	8/24/2018		Kennedy Hodges, L.L.P.

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Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.



**Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices**  
(Updated September 17, 2018)

0:18-cv-00207-JNE-DTS	Guenther, Gary v 3M Company et al	8/6/2018	8/27/2018		Bernstein Liebhard LLP
0:18-cv-00275-JNE-DTS	Owens, Janis v. 3M Company et al	7/31/2018	8/2/2018		Bernstein Liebhard LLP
0:18-cv-00318-JNE-DTS	Amador, George v. 3M Company et al	7/5/2018	7/26/2018		DeGaris & Rogers, LLC
0:18-cv-00354-JNE-DTS	McDermott, Kevin et al v. 3M Company et al	7/18/2018	8/8/2018		Parker Waichman
0:18-cv-00891-JNE-DTS	Winn, Robert v. 3M Company et al	7/24/2018	8/14/2018		Murray Law Firm
0:18-cv-00916-JNE-DTS	Foltz, Donald v. 3M Company et al	8/17/2018	9/7/2018		Hare, Wynn, Newell & Newton, LLP
0:18-cv-00944-JNE-DTS	Kotowski, Joseph et al v. 3M Company et al	8/17/2018	9/7/2018		Meshbesher & Spence
Case Number	Title	2nd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:17-cv-04375-JNE-DTS	Baker, David v. 3M Company, et al.	5/29/2018	6/19/2018	7/13/2018 8/10/2018	Bernstein Liebhard LLP
0:17-cv-04512-JNE-DTS	Cunningham, Mary v. 3M Company, et al.	5/29/2018	6/19/2018	7/13/2018 8/10/2018	Bernstein Liebhard LLP
0:17-cv-04517-JNE-DTS	Henderson, Stephanie v. 3M Company et al	5/7/2018	5/28/2018	6/15/2018 7/13/2018 8/10/2018	Bernstein Liebhard LLP
0:17-cv-04857-JNE-DTS	Murphy, Bennie v 3M et al	5/29/2018	6/19/2018	7/13/2018 8/10/2018	Bernstein Liebhard LLP
0:17-cv-04877-JNE-DTS	McDonald, Ethel v 3M et al	5/29/2018	6/19/2018	7/13/2018 8/10/2018	Bernstein Liebhard LLP
0:18-cv-00167-JNE-DTS	Shoaf et al v. 3M Company, et al.	6/4/2018	6/25/2018	7/13/2018 8/10/2018	The Miller Firm, LLC
0:17-cv-03549-JNE-DTS	Salinas, Juan v. 3M Company et al	7/10/2018	7/31/2018		Kennedy Hodges, L.L.P.
0:17-cv-05083-JNE-DTS	Meredith, Benjamin v. 3M Company et al	7/17/2018	8/7/2018		DeGaris & Rogers, LLC
Case Number	Title	3rd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:17-cv-04754-JNE-DTS	Weaver, Donna v. 3M Company, et al.	6/19/2018	7/10/2018	8/10/2018	Kennedy Hodges, L.L.P.
0:17-cv-03912-JNE-DTS	Kellett, Jackson v. 3M Company et al	7/26/2018	8/16/2018		Kennedy Hodges, L.L.P.

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**Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response**  
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Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:16-cv-02298-JNE-DTS	D'andrea, Mario et al v. 3M Company et al	4/19/2017 7/10/2018	7/13/2018 8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-03573-JNE-DTS	Parker, Lloyd v. 3M Company et al	5/7/2018	6/15/2018 7/13/2018 8/10/2018	Bernstein Liebhard LLP
0:17-cv-05052-JNE-DTS	Hanks, Julie v. 3M Company et al	6/6/2018	7/13/2018 8/10/2018	Brown and Crouppen, P.C.
0:18-cv-00240-JNE-DTS	Dixon, Michael v. 3M Company	6/4/2018	7/13/2018 8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00424-JNE-DTS	Harris, Lola v. 3M Company et al	6/13/2018	7/13/2018 8/10/2018	Kirtland & Packard LLP
0:15-cv-03736-JNE-DTS	Printup ( Charlene Smiley) v. 3M Company et al	6/28/2017	8/10/2018	Gustafson Gluek PLLC
0:17-cv-01701-JNE-DTS	Wright, Michael v. 3M Company	6/22/2017	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:17-cv-01703-JNE-DTS	Ussery, Bruce v. 3M Company	6/22/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-02426-JNE-DTS	Johnson, Edwards et al v. 3M Company	6/22/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-02901-JNE-DTS	Moore, Michael v. 3M Company et al	2/14/2018	8/10/2018	Kennedy Hodges, L.L.P.
0:17-cv-04009-JNE-DTS	Rude, Lynas v. 3M Company et al	5/7/2018 8/17/2018	6/15/2018 7/13/2018 8/10/2018	Bernstein Liebhard LLP
0:17-cv-04845-JNE-DTS	Murray, Dan v. 3M Company et al	5/17/2018	6/15/2018 7/13/2018 8/10/2018	Kirtland and Packard LLP
0:17-cv-04967-JNE-DTS	Ewing, Kelly v. 3M Company	6/22/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:17-cv-05327-JNE-DTS	Lykes-Tarver, Tracy v. 3M Company	6/18/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:17-cv-05348-JNE-DTS	Wilmer, Roxanne v. 3M Company et al	7/2/2018	8/10/2018	Schlichter Bogard & Denton, LLP
0:17-cv-05424-JNE-DTS	Kent, Maude v. 3M Company	7/10/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA

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Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:17-cv-05426-JNE-DTS	Meyers, Leslie v. 3M Company	7/10/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-00088-JNE-DTS	Christ, Ralph et al v. 3M Company et al	6/25/2018	8/10/2018	Murray Law Firm
0:18-cv-00146-JNE-DTS	Goodrum, Vernon v. 3M Company et al	7/5/2018	8/10/2018	GoldenbergLaw, PLLC
0:18-cv-00231-JNE-DTS	Lambert, Vincent v. 3M Company et al	7/10/2018	8/10/2018	Swartz & Swartz, P.C.
0:18-cv-00262-JNE-DTS	Brabham, Earnest v. 3M Company et al	6/18/2018	8/10/2018	The Law offices of Travis R. Walker, P.A.
0:18-cv-00432-JNE-DTS	Falchetta, Edward v. 3M Company	6/8/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00512-JNE-DTS	Flynn, Michael v. 3M Company et al	6/19/2018	8/10/2018	GoldenbergLaw, PLLC
0:18-cv-00593-JNE-DTS	Franklin, Kenneth v. 3M Company	6/19/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00594-JNE-DTS	Roberts, Greta v. 3M Company	7/2/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00599-JNE-DTS	White, Cynthia v. 3M Company	7/10/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00600-JNE-DTS	Trude, Barbara v. 3M Company	7/3/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00628-JNE-DTS	Boyle, Maureen v. 3M Company et al	7/2/2018	8/10/2018	Langdon and Emison
0:18-cv-00665-JNE-DTS	Hughes, Wilbert v. 3M Company et al	7/5/2018	8/10/2018	Bachus & Schanker, LLC
0:18-cv-00669-JNE-DTS	Counard-Stowell, Sandra v. 3M Company	7/3/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00670-JNE-DTS	Darwick, Robert v. 3M Company	7/18/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00671-JNE-DTS	McAvoy, Karen v. 3M Company	7/9/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00672-JNE-DTS	Prudhomme, Laura v. 3M Company	7/2/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A

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Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-00673-JNE-DTS	Rudolph, Sheila v. 3M Company	7/10/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00674-JNE-DTS	Welch, Leon v. 3M Company	7/10/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00675-JNE-DTS	Wolf, Joyce v. 3M Company	6/29/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00676-JNE-DTS	Bunk, Susan v. 3M Company	7/5/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00678-JNE-DTS	Tawes, George v. 3M Company	6/6/2018	7/13/2018 8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00688-JNE-DTS	Conrad, John v. 3M Company	7/11/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00689-JNE-DTS	Alexander, Todd v. 3M Company	7/16/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00690-JNE-DTS	Dupont, Roy v. 3M Company	7/5/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00691-JNE-DTS	Hauser, Michael v. 3M Company	6/29/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00881-JNE-DTS	Willimon, Brenda v. 3M Company et al	7/24/2018	8/10/2018	Pendley, Baudin & Coffin L.L.P.
0:18-cv-00884-JNE-DTS	Bosarge, Judy v. 3M Company	7/10/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-00962-JNE-DTS	Snow, Lorraine v. 3M Company	7/9/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00963-JNE-DTS	Wolfe, Stanley v. 3M Company	7/5/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00965-JNE-DTS	Branch, Charles v. 3M Company	7/10/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-01096-JNE-DTS	Phillips, Virginia v. 3M Company	7/9/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA

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Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-01097-JNE-DTS	Ramondo, Joseph v. 3M Company	7/9/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01099-JNE-DTS	Reid, Patricia v. 3M Company	7/9/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01100-JNE-DTS	Richards, Linda v. 3M Company	6/19/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01101-JNE-DTS	Roshell, Doreen v. 3M Company	6/19/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01111-JNE-DTS	Turner, Carrie v. 3M Company	6/19/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01119-JNE-DTS	Scott, Margaret v. 3M Company	7/9/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01120-JNE-DTS	Sherman, Mary v. 3M Company	6/19/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01123-JNE-DTS	Twichell, Ben v. 3M Company	6/19/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01125-JNE-DTS	Dixon, Harold et al v. 3M Company	6/19/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01126-JNE-DTS	Watkins, Franscine v. 3M Company	6/19/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01136-JNE-DTS	Boylan, Gerald Jr.v. 3M Company	6/19/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01137-JNE-DTS	Chapman, Joann v. 3M Company	6/11/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01139-JNE-DTS	Clark, Lasonia v. 3M Company	6/8/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01140-JNE-DTS	Berk, Judith v. 3M Company	6/19/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01148-JNE-DTS	Libbey, Letha v. 3M Company	7/2/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA

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## Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

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Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-01154-JNE-DTS	Lombardo, James v. 3M Company	7/3/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01157-JNE-DTS	Mason, Walter Jr. v. 3M Company	7/3/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01158-JNE-DTS	Owens, Sandra v. 3M Company	7/5/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01170-JNE-DTS	Jasmund, Allen v. 3M Company	6/19/2018	8/10/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01345-JNE-DTS	Lane, Tonya v. 3M Company et al	7/23/2018	8/10/2018	Meshbeshier & Spence
0:17-cv-03252-JNE-DTS	Gorbett, Jamie v. 3M Company et al	5/7/2018		Bernstein Liebhard LLP
0:17-cv-04778-JNE-DTS	Brown, Ina v. 3M Company et al.	4/17/2018		Bernstein Liebhard LLP
0:17-cv-05047-JNE-DTS	Clark, Georgia v. 3M Company et al	6/18/2018		Schlichter Bogard & Denton, LLP
0:17-cv-05465-JNE-DTS	Brown, Cynthia v. 3M Company et al	7/16/2018		GoldenbergLaw, PLLC
0:18-cv-00076-JNE-DTS	Kurbis, Melanie v. 3M Company, et al.	7/10/2018		Davis & Crump, P.C.
0:18-cv-00159-JNE-DTS	Roberts, Solomon et al v. 3M Company et al	6/18/2018		Morgan & Morgan Complex Litigation Group
0:18-cv-00348-JNE-DTS	Smith, Dorothy v. 3M Company et al	7/16/2018		The Miller Firm, LLC
0:18-cv-00481-JNE-DTS	Brann, Stefan v. 3M Company et al	7/9/2018		Lockridge, Grindal Nauen P.L.L.P.
0:18-cv-00740-JNE-DTS	McKinney, Kimberly et al v. 3M Company et al	7/16/2018		Schlichter Bogard & Denton, LLP
0:18-cv-00808-JNE-DTS	Thomas-Jackson, Callie v. 3M Company et al	7/17/2018		The Webster Law Firm
0:18-cv-01102-JNE-DTS	Tate, Melvin v. 3M Company	7/30/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01103-JNE-DTS	Tedford, Louise v. 3M Company	8/17/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01113-JNE-DTS	Shade, Collette v. 3M Company	7/30/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01121-JNE-DTS	Stapley, William v. 3M Company	8/16/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA

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Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-01210-JNE-DTS	Johnston, Jean v. 3M Company	7/24/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01507-JNE-DTS	Finley, William III v. 3M Company	7/24/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01510-JNE-DTS	Butters, Kenneth v. 3M Company	7/24/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01517-JNE-DTS	Custer, Nettie v. 3M Company	7/24/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA

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